

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA

In Re:

Connie Marie Bunn,

Debtor,

BKY 09-34358

ADV 10-03095

Connie Marie Bunn,

Plaintiff,

vs.

Saint Paul Public Housing Agency,
City of Saint Paul,

Defendant.

STIPULATION OF SETTLEMENT

This Stipulation of Settlement is entered into by and between Connie Marie Bunn and Saint Paul Public Housing Agency.

RECITALS

1. Defendant, The Public Housing Agency of the City of Saint Paul (hereinafter "Defendant") is a creditor of Plaintiff, Connie Marie Bunn, arising out of Plaintiff's rental of certain rental housing and for certain damages Plaintiff allegedly owes Defendant from 1997.
2. Plaintiff filed a petition in bankruptcy on June 24, 2009.
3. Defendant was not listed as a creditor on Plaintiff's bankruptcy schedules filed

in her case.

4. Defendant received \$1,185.00 on May 21, 2010 through a recapture of Plaintiff's Minnesota income tax refund.

5. Plaintiff commenced this adversary proceeding to obtain the dischargeability of Defendant's claim against Plaintiff.

6. Plaintiff also seeks a return from Defendant of the funds received by Defendant in the recapture of Plaintiff's Minnesota income tax refund.

7. Plaintiff and Defendant desire to settle and resolve any and all matters between them and to avoid further expenses, delay, and legal costs.

NOW, THEREFORE, in consideration of the foregoing, which is an integral part hereof, it is agreed as follows:

1. Plaintiff and Defendant agree that the debt of Plaintiff to Defendant is dischargeable in bankruptcy and that the court may enter an order discharging the debt of Plaintiff to Defendant.

2. Defendant agrees to pay to Plaintiff the sum of \$592.50, representing one-half of the amount recaptured from Plaintiff's Minnesota income tax refund.

3. Except for the obligations under this settlement, Plaintiff and Defendant waive and release any further claims against each other that either may have against the other to the date of this agreement.

4. The parties shall pay their own attorney's fees and costs in this proceeding.

5. The parties agree that this Stipulation of Settlement represents the full and final expression of settlement and may not be modified or amended except by a written agreement executed by both parties.

PLAINTIFF:

Dated: 6/30/10, 2010

Connie Marie Bunn
Connie Marie Bunn

DUDLEY AND SMITH, P.A.

Dated: June 30, 2010

By Steven C. Opheim
Steven C. Opheim
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DEFENDANT:

Rolly Gray for RPM
Ronald P. Moen, Controller
Public Housing Agency of the City of Saint Paul

Dated: July 7, 2010

By: Laura Pietan
Laura Pietan
Attorney for Defendant
Assistant City Attorney
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